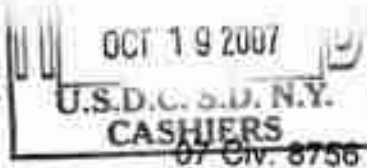


5-638563

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



MAERSK LINE,

Plaintiff,

- against -

AMENDED
CIVIL COMPLAINT
IN ADMIRALTY

USCA-SEABELL, INC.,

Defendant.

Plaintiff MAERSK LINE, by its attorneys, LAW OFFICES OF ALBERT J. AVALLONE & ASSOCIATES, as and for its Amended Complaint against defendant USCA-SEABELL, INC., in personam, in a cause of action civil and maritime, alleges upon information and belief:

1. This is an admiralty and maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure, the Ocean Shipping Reform Act of 1999, 46 U.S.C., App. Section 1701, et seq., and Paragraph 26 of the Bills of Lading.
2. At all times hereinafter mentioned, plaintiff MAERSK LINE was and still is a corporation duly organized and existing under the laws of the State of Delaware with offices and a place of business at 6000 Carnegie Blvd., Charlotte, NC 28209.
3. Upon information and belief and at all times hereinafter mentioned, defendant USCA-SEABELL, INC. was and still is a corporation organized and existing under the laws of the State of New York, with offices and a place of business at 50 Harrison St., Hoboken, NJ 07030.
4. From on or about December 1, 2006 to the present, defendant delivered cargoes to plaintiff at various ports for the purpose of having the cargoes carried to various ports of destination, there to be delivered to the consignees and/or their agents, in consideration of payment by defendant to plaintiff of ocean freight and related charges, calculated pursuant to a Service Contract between the parties and/or plaintiff's tariff.

charges totalling \$387,025.19.

6. Defendant has failed to remit the payment due of \$387,025.19, although duly demanded (Exhibit A).

7. All shipments were properly carried by plaintiff, or are in the process of being carried by plaintiff.

8. Plaintiff has performed and is performing all acts required to be performed by plaintiff.

9. Defendant has failed and refused and continues to fail and refuse to remit payment of \$387,025.19, although duly demanded.

8. By reason of the foregoing, plaintiff has sustained damages in the amount of \$387,025.19 which, although duly demanded, have not been paid.

WHEREFORE, plaintiff prays:

1. For judgment in the amount of plaintiff's damages, together with interest thereon, costs, disbursements and a reasonable attorney's fee.

2. That process in due form of law according to the practice of this Court in cases of admiralty and maritime jurisdiction may issue against the defendant citing it to appear and answer all the singular matters aforesaid.

3. That plaintiff have such other and further relief in the premises as in law and justice it may be entitled to receive.

Dated: New York, New York
October 18, 2007

LAW OFFICES OF
ALBERT J. AVALLONE & ASSOCIATES

By



Albert J. Avallone - AA1679
Attorneys for Plaintiff
MAERSK LINE
551 Fifth Avenue, Suite 1625
New York, NY 10176
(212) 696-1760



MAERSK LINE

2000 Carnegie Boulevard, Charlotte, NC 28209

Customer Name: USCA SEABELL INC

Customer Number: 33100231448

Group:

Statement of Account as of:

Invoice Number	Invoice Date	Invoice Amount	Original Amount	Net Amount	Charged Amount	Days	Supplier Ref
U138485903	8/54/2007	7/22/2007	\$2,146.00	\$0.00	\$2,146.00	86	OE004827
U138485904	8/54/2007	7/22/2007	\$2,133.00	\$0.00	\$2,133.00	86	OE004819
U138493949	5/23/2006	7/22/2007	\$4,090.00	\$0.00	\$4,090.00	86	OE004984
U138460811	5/23/2007	7/22/2007	\$3,999.01	\$0.00	\$3,999.01	86	OE004812
U138480831	5/23/2007	7/22/2007	\$4,090.00	\$0.00	\$4,090.00	86	OE004945
U138482770	5/23/2007	7/22/2007	\$4,090.00	\$0.00	\$4,090.00	86	OE004946
U138566011	5/23/2007	7/23/2007	\$4,579.18	\$4,135.00	\$444.18	85	23154 WS
U138614819	8/54/2007	7/26/2007	\$4,015.00	\$0.00	\$4,015.00	82	OE004787
U138838893	5/24/2007	7/30/2007	\$3,753.00	\$0.00	\$3,753.00	78	HOU 512087
U138512611	8/54/2007	7/30/2007	\$2,398.00	\$0.00	\$2,398.00	78	OE004926
9AL8839358	5/23/2007	7/30/2007	\$4,579.15	\$4,135.00	\$444.15	78	23154 WS
U138533849	8/54/2007	8/5/2007	\$3,999.18	\$0.00	\$3,999.18	72	OE004888
U138625773	5/23/2007	8/6/2007	\$4,891.00	\$0.00	\$4,891.00	71	OE005050
U138548396	8/54/2007	8/6/2007	\$2,863.00	\$0.00	\$2,863.00	71	OE005040
U13849703	5/23/2007	8/8/2007	\$11,741.61	\$10,592.00	\$1,149.61	69	LC ZLC009-2703353
U138535046	5/23/2007	8/8/2007	\$14,677.01	\$13,240.00	\$1,437.01	69	LC ZCC009-2703252

EXHIBIT "A"

U138788129	523616665	8/9/2007	\$17,100.73	\$14,943.00	\$2,157.73	68 6276
U138667174	854813550	8/9/2007	\$4,015.00	\$0.00	\$4,015.00	68 OR004786
U138800767	854947061	8/13/2007	\$5,585.00	\$0.00	\$5,585.00	61 OR004690
U138577910	854876446	8/13/2007	\$3,998.31	\$0.00	\$3,998.31	64 OE004587
U138584545	523695137	8/13/2007	\$4,225.00	\$0.00	\$4,225.00	64 OE005013
U138584544	523695186	8/13/2007	\$2,398.00	\$0.00	\$2,398.00	64 OE005051
U138663986	523717025	8/13/2007	\$2,436.00	\$0.00	\$2,436.00	64 OR005058
U138677074	523556620	8/17/2007	\$3,726.00	\$0.00	\$3,726.00	60 23154 WS
U138594602	854932210	8/19/2007	\$4,090.00	\$0.00	\$4,090.00	58 OE004925
U138596866	523564896	8/19/2007	\$5,871.00	\$5,115.00	\$756.00	58 LISA4647
U138618001	854964089	8/19/2007	\$3,998.55	\$2,398.00	\$1,600.55	58 OE005022
U138680449	523675426	8/20/2007	\$3,315.70	\$3,028.00	\$287.70	57 23154 WS
CN08829410	523050831	8/23/2007	\$5,155.00	\$4,905.00	\$250.00	54 LOB11288
U138625868	854920217	8/23/2007	\$4,015.00	\$0.00	\$4,015.00	54 OE004947
U138626220	523737172	8/23/2007	\$4,700.00	\$0.00	\$4,700.00	54 23154 WS
U138755569	523725516	8/23/2007	\$5,293.00	\$3,945.00	\$1,348.00	54 23154 WS
U138625754	523615240	8/26/2007	\$2,231.00	\$0.00	\$2,231.00	51 23154 WS
U138644310	523645763	8/30/2007	\$3,843.24	\$0.00	\$3,843.24	47 23154 WS
U138700602	523734689	8/30/2007	\$4,570.00	\$0.00	\$4,570.00	47 23154 WS
U138797399	523786088	9/2/2007	\$4,225.00	\$0.00	\$4,225.00	44 OE005454
U138786771	523830714	9/2/2007	\$2,411.00	\$0.00	\$2,411.00	44
U138841040	523830730	9/2/2007	\$4,915.00	\$0.00	\$4,915.00	44 23154 WS

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U138767814	523899288	9/2/2007	\$2,511.00	\$0.00	\$2,511.00	44 OF005283
U138798748	854957138	9/2/2007	\$4,090.00	\$0.00	\$4,090.00	44 OF005067
U138710798	523686782	9/4/2007	\$4,005.00	\$0.00	\$4,005.00	42 23154 WS
U138657986	523645584	9/4/2007	\$3,158.00	\$0.00	\$3,158.00	42 23154 WS
U138739622	855025585	9/5/2007	\$4,185.00	\$0.00	\$4,185.00	41 OF005164
U138892981	523583907	9/8/2007	\$5,026.00	\$0.00	\$5,026.00	38 23154 WS
U138732382	523830735	9/8/2007	\$2,398.00	\$0.00	\$2,398.00	38 OF005222
U138708973	523861062	9/9/2007	\$2,498.00	\$0.00	\$2,498.00	37 OF005323
U138732364	523861061	9/9/2007	\$2,498.00	\$0.00	\$2,498.00	37 OF005357
U138701975	523534459	9/9/2007	\$4,405.00	\$0.00	\$4,405.00	37 23154 WS
U138756241	523898293	9/9/2007	\$5,081.00	\$0.00	\$5,081.00	37 OF005106
U138707818	523899286	9/9/2007	\$2,498.00	\$0.00	\$2,498.00	37 OF005322
U138702367	855103480	9/9/2007	\$4,425.00	\$0.00	\$4,425.00	37 OF005206
U138747622	523810830	9/9/2007	\$4,665.00	\$0.00	\$4,665.00	37 OF005258
U138876667	523869916	9/10/2007	\$3,754.11	\$0.00	\$3,754.11	36 523869916
U138700172	523694722	9/10/2007	\$3,266.00	\$0.00	\$3,266.00	36 23154 WS
U138734293	854967641	9/12/2007	\$4,015.00	\$0.00	\$4,015.00	34 OF005012
U138704867	855025601	9/12/2007	\$3,515.00	\$0.00	\$3,515.00	34 OF005165
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U138782671	523745339	9/16/2007	\$5,083.00	\$0.00	\$5,083.00	30 23154 WS
U138807543	523839471	9/17/2007	\$9,189.40	\$0.00	\$9,189.40	29 23154 WS
U138818925	523775754	9/17/2007	\$3,158.00	\$0.00	\$3,158.00	29 23154 WS

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U138819838	523927191	9/24/2007	\$4,501.00	\$0.00	\$4,501.00	22 231.54 W/S
U138847059	523927600	9/26/2007	\$5,498.00	\$0.00	\$5,498.00	20 231.54 W/S
U138884945	524044910	9/26/2007	\$132.29	\$0.00	\$132.29	20 231.54 W/S
U138881946	523927580	9/26/2007	\$6,030.82	\$0.00	\$6,030.82	20 231.54 W/S
U1388850688	524013763	9/26/2007	\$6,146.78	\$0.00	\$6,146.78	20 6440
U138812044	524065556	9/27/2007	\$1,127.00	\$0.00	\$1,127.00	19 231.54 W/S
U138842018	523927659	9/27/2007	\$3,113.00	\$0.00	\$3,113.00	19 231.54 W/S
U138789806	523948078	9/29/2007	\$4,371.00	\$0.00	\$4,371.00	17 231.54 W/S
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U138809529	523898115	10/1/2007	\$3,880.32	\$0.00	\$3,880.32	15 231.54 W/S
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U138810570	523960403	10/1/2007	\$4,051.00	\$0.00	\$4,051.00	15 231.54 W/S

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U138810273	7439.19683	10/1/2007	\$2,782.00	\$0.00	\$2,782.00	12.23154 W/S
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U138842023	523889468	10/4/2007	\$4,906.00	\$0.00	\$4,906.00	12.23154 W/S
U138834294	524076185	10/4/2007	\$3,573.00	\$0.00	\$3,573.00	12.23154 W/S
U138880029	855297369	10/7/2007	\$2,581.00	\$0.00	\$2,581.00	9.0900517
U138857913	524074565	10/8/2007	\$3,882.12	\$0.00	\$3,882.12	8.23154 W/S
U138857944	524129958	10/8/2007	\$3,882.12	\$0.00	\$3,882.12	8.23154 W/S
U138861758	524065858	10/8/2007	\$3,431.00	\$0.00	\$3,431.00	8.23154 W/S
U138857889	523938223	10/8/2007	\$5,773.00	\$0.00	\$5,773.00	8.23154 W/S
U1388672720	524065859	10/8/2007	\$3,431.00	\$0.00	\$3,431.00	8.23154 W/S
U1388672731	524129964	10/8/2007	\$3,882.12	\$0.00	\$3,882.12	8.23154 W/S
U138872678	524129932	10/8/2007	\$3,431.00	\$0.00	\$3,431.00	8.23154 W/S
U138872714	524129954	10/8/2007	\$3,882.12	\$0.00	\$3,882.12	8.23154 W/S
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U138839491	524102679	10/8/2007	\$3,431.00	\$0.00	\$3,431.00	8.23154 W/S
U138873764	524084007	10/8/2007	\$3,882.12	\$0.00	\$3,882.12	8.23154 W/S
U138873758	524084078	10/8/2007	\$3,431.00	\$0.00	\$3,431.00	8.23154 W/S
U138825940	523927142	10/8/2007	\$4,381.00	\$0.00	\$4,381.00	8.23154 W/S
U138894388	523819440	10/12/2007	\$3,951.00	\$0.00	\$3,951.00	4.23154 W/S
U138894278	523716939	10/14/2007	\$4,051.00	\$0.00	\$4,051.00	2.23154 W/S
U138894346	524084867	10/14/2007	\$2,681.00	\$0.00	\$2,681.00	2.0900564
U138879547	524122927	10/16/2007	\$3,781.00	\$0.00	\$3,781.00	0.23154 W/S

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U138878272	524122905	10/16/2007	\$4,433.21	\$0.00	\$4,433.21	0.23154 W/S
U138878250	524091535	10/16/2007	\$3,883.21	\$0.00	\$3,883.21	0.23154 W/S
U138880824	855161344	10/21/2007	\$4,111.00	\$0.00	\$4,111.00	5 Of:00h312
U138883796	524129960	10/22/2007	\$3,431.00	\$0.00	\$3,431.00	6.23154 W/S
Group Total:			\$460,303.49	\$73,482.00	\$386,821.49	Avg. Days: 90.50

Customer Name:

Customer Number:

Transaction Number:

Invoice Number:

Invoice Number:

Invoice Number:

Invoice Number:

Invoice Number:

Invoice Number:

Invoice Number:

Invoice Number:

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Statement of Account as of:

28-23154 WS

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Group Total:

\$203.70

\$0.00

\$203.70

Avg. Days:

94.00

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